

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
)	
vs.)	Case No. 16 CR 793
)	
MICHAEL PERSAUD,)	Judge Wood
)	
Defendant)	

DEFENDANT’S UNOPPOSED MOTION TO LIFT TRAVEL RESTRICTION

NOW COMES the Defendant, Michael Persaud, by and through his attorneys, Sami Azhari and Michael Leonard and in support of his unopposed motion to lift the travel restriction, states as follows:

1. Mr. Persaud is currently unable to travel outside of Arizona and is seeking to modify his travel restriction.
2. Mr. Persaud’s father resides in San Diego, California, and his mother and sister live in Denver, Colorado.
3. Mr. Persaud also has extended family that reside near Tampa, Florida.
4. Mr. Persaud’s girlfriend’s parents are in Miami, Florida.
5. While Mr. Persaud does not have any specific travel dates, he is requesting the ability to visit his family as well as his girlfriend’s family during the pendency of the case.
6. Mr. Persaud’s parents and his girlfriend’s parents are in their 70’s and 80’s and would like the ability to see them if health issues arise as well as visit the extended family for any holidays and birthdays.
7. Mr. Persaud has been supervised by pretrial services in Illinois and Arizona since February 2017 and has not violated any terms.

8. His pretrial services officers in Arizona and Illinois do not object to his request to modify his ability to travel.

WHEREFORE, the defendant, MICHAEL PERSAUD, prays that this Court grant his motion to modify his travel restriction.

Respectfully submitted,

/s/Sami Azhari

Sami Azhari, attorney for Michael Persaud

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